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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

Wavve Americas, Inc., a Delaware
corporation,

Plaintiff,

vs.

Unknown Registrant Of Kokoatv.Net;
Unknown Registrant Of Kokoa.Tv; And
Unknown Registrant Of Vidground.Com,

Defendants.

Case No. 2:23-cv-01819-MTL

**DECLARATION OF KYLE W.
KELLAR IN SUPPORT OF
PLAINTIFF'S MOTION FOR
LEAVE TO SERVE DEFENDANT BY
ALTERNATIVE MEANS**

I, Kyle W. Kellar, declare as follows:

I am a partner with the law firm of Lewis Roca Rothgerber Christie LLP ("LRRC"). I am counsel for wavve Americas, Inc. ("wA" or "Plaintiff") in this action. I submit this declaration in support of wA's Motion for Leave to Serve Defendant by Alternative Means. I make this declaration based on my personal knowledge and could competently testify to the facts stated herein if called upon to do so.

1. NameCheap, Inc. ("NameCheap") served the private, unmasked, WHOIS information for each of KOKOA.TV, KOKOATV.NET, and VIDGROUND.COM on wA via email to me on September 12, 2023. A

1 true and correct copy of NameCheap's production was attached to the First
2 Amended Complaint as Exhibit AK.

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4 2. According to the private WHOIS information produced by NameCheap, the
5 registrant of each of KOKOA.TV, KOKOATV.NET, and
6 VIDGROUND.COM is an individual named Tumi Max residing in
7 Thailand.

8
9 I declare under penalty of perjury under the laws of the United States of America
10 that the foregoing is true and correct and that this declaration.

11 Executed on the 13th day of September 2023, in Los Angeles, California.

12
13 By: /s/ Kyle W. Kellar
14 Kyle W. Kellar
15 *Attorneys for Plaintiff Wavve Americas, Inc.*
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Office Address

LEWIS  ROCA